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12 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
13 and OTTOMOTTO LLC

14 UNITED STATES DISTRICT COURT  
15 NORTHERN DISTRICT OF CALIFORNIA  
16 SAN FRANCISCO DIVISION

17 WAYMO LLC,  
18 Plaintiff,  
19 v.  
20 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
21 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF RHIAN  
MORGAN IN SUPPORT OF UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO'S OPPOSITION TO  
WAYMO'S BRIEF ON  
OUTSTANDING PRIVILEGE ISSUES**

Date: June 23, 2017  
Time: 10:00 a.m.  
Crm: F, 15th Floor  
Judge: The Honorable Jacqueline S.  
Corley

Trial Date: October 10, 2017

1 I, Rhian Morgan, declare as follows:

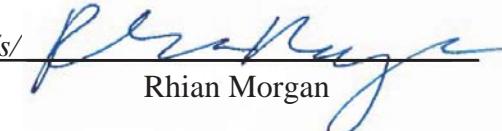
2 1. I have been an employee of Uber Technologies, Inc. (“Uber”) since August 24,  
3 2016, and prior to that I served as HR Lead at Ottomotto LLC (“Ottomotto”). I make this  
4 declaration in support of Uber’s and Ottomotto’s opposition to Waymo’s Letter Brief regarding  
5 Certain Outstanding Privilege Issues. I have personal knowledge of the facts stated herein and, if  
6 called as a witness, I could and would testify competently as to these facts.

7 2. I began working for 280 Systems Inc. (“280 Systems”) on or about January 15,  
8 2016. In February 2016, Ottomotto changed its name from 280 Systems to Ottomotto.

9 3. In April 2017, I submitted a declaration in support of Uber’s and Ottomotto’s  
10 opposition to Waymo’s Motion for a Preliminary Injunction. (Dkt. 587-37.) That declaration is  
11 incorporated herein by reference.

12 4. Attached hereto as Exhibit A is a true and correct copy of Anthony Levandowski’s  
13 employment agreement with 280 Systems.

14 5. I declare under penalty of perjury under the laws of the United States that the  
15 foregoing is true and correct. Executed this 19th day of June, 2017, in San Francisco, California.

16  
17   
18 Rhian Morgan